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July 21, 2016

George Papadopoulos
EPA Office of Ecosystem Protection
5 Post Office Square, Suite 100
Mailcode OEP 06-1
Boston, MA 02109-3912

RE: Draft Authorization To Discharge Under NPDES For Entergy's Pilgrim Nuclear Power Station (NPDES Permit No. MA0003557)

Dear Mr. Papadopoulos:

I am writing today as Representative of the Ninth Congressional District of Massachusetts, which includes the Town of Plymouth. As you know, the Plymouth and extended regional community host the Pilgrim Nuclear Power Station (PNPS).

As noted in the Draft National Pollution Discharge Elimination System (NPDES) Permit, PNPS has been operating under an expired permit since 1996. It had been expressed to me that the issuance of this permit in 1991 and subsequent administration by the EPA may not have incorporated opportunities for public comment. I appreciate that the EPA has afforded the public this current opportunity to review the NPDES and make comments as appropriate, and to do so in a public setting.

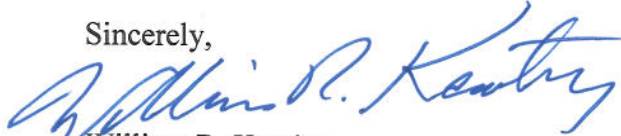
First, I respectfully encourage EPA to continue incorporating current data on climate change and ocean acidification in review of PNPS. Given that EPA is considering decades-old data that may not reflect the most recent sea level rise and ocean temperature information, and that PNPS, under the variance proposed by the NPDES, will be discharging significantly heated water into Cape Cod Bay for three more years, I urge the EPA to reconsider whether a closed-cycle system would provide significant environmental benefits and contribute to the safeguarding of Cape Cod Bay.

I recently hosted a conference on Ocean and Coastal Acidification where I heard from many experts concerned by the effects that lower pH levels have had on shellfish and other marine organisms in Cape Cod Bay, Buzzards Bay etc. I remain concerned that increasing acidity in Cape Cod Bay waters will result in increased corrosion of affected components of the plant, including the outfall systems and buried pipes and tanks. Increased corrosion can lead to leaks of on-site chemicals such as oil and gasoline, and I would urge the EPA to take these factors into consideration in the NPDES.

Finally, I encourage EPA to expand its monitoring of the discharge from all of the plant's outfalls. Effluent limits and thermal discharge measurements should be made as frequently as is feasible, and resulting data should be made available to the public in an easily accessible format. As we look toward the decommissioning of Pilgrim Station, it is critical that EPA provide for vigorous post-closure monitoring and environmental assessments to ensure that contaminants do not migrate off the plant and into Cape Cod Bay.

Thank you for the opportunity to provide these comments.

Sincerely,



William R. Keating
Member of Congress